

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re:  
City of Detroit, Michigan,  
Debtor.

Bankruptcy Case No. 13-53846  
Honorable Thomas J. Tucker  
Chapter 9

**CITY OF DETROIT’S OBJECTION TO SHEILA REED’S APPLICATION FOR  
ADMINISTRATIVE EXPENSE CLAIM**

The City of Detroit, Michigan (“City”) files this Objection to Ms. Sheila Reed’s (“Reed”) Application for Administrative Expense Claim (“Motion,” Doc. No. 9135) because it was not timely filed. In support of this Objection, the City respectfully states as follows:

1. The City’s Eighth Amended Plan for the Adjustment of Debts of the City of Detroit (“Plan,” Docket Number 8045) provides that applications for administrative expenses needed to be “[f]iled and served on the City no later than 45 days after the Effective Date.” Plan, part II.A.2.a. An applicant who does not submit his or her claim by that date “will be forever barred from asserting such Administrative Claims against the City or its property, and such Administrative Claims will be deemed discharged as of the Effective Date.” *Id.*

2. On November 12, 2014, this Court entered an Order Confirming the Plan. (Doc. No. 8272). The Effective Date of the Plan occurred on December 10, 2014. Notice of (I) Entry of Order Confirming Eighth Amended Plan for the Adjustment of Debts of the City of Detroit and (II) Occurrence of Effective Date, Doc. No. 8649 (“Notice of Effective Date”).

3. Administrative Claims against the City thus were due by January 24, 2015, or, since that day was a Saturday, no later than January 26, 2015. *See also* Notice of Effective Date at 7. Reed received the Notice of Effective Date by first class mail. *See* Certificate of Service, Doc. No. 8970-4 at Page 176 of 569.

4. Reed did not file her Motion until January 30, 2015. Thus, the Motion is untimely and should be denied.

5. The City files this Objection without prejudice to or waiver of its rights pursuant to section 904 of the Bankruptcy Code, and nothing herein is intended to, shall constitute or shall be deemed to constitute the City's consent, pursuant to section 904 of the Bankruptcy Code, to this Court's interference with (a) any of the political or governmental powers of the City, (b) any of the property or revenues of the City or (c) the City's use or enjoyment of any income-producing property.

6. The City expressly reserves the right to amend, modify, or supplement this Objection.

7. Should the Court dismiss or overrule one or more of the grounds of objection stated in this Objection, the City reserves its right to object to the Motion on other procedural and substantive grounds, and on the merits of the underlying claim. The City also expressly reserves any and all rights, claims, defenses and objections it may have against Reed in any actions or suits related to the Motion or the underlying claim.

May 4, 2015

Respectfully submitted,

By: /s/ Marc N. Swanson

Jonathan S. Green (P33140)

Marc N. Swanson (P71149)

MILLER, CANFIELD, PADDOCK AND  
STONE, P.L.C.

150 West Jefferson, Suite 2500

Detroit, Michigan 48226

Telephone: (313) 496-7591

Facsimile: (313) 496-8451

green@millercanfield.com

swansonm@millercanfield.com

ATTORNEYS FOR THE CITY OF DETROIT

**EXHIBIT 1 – CERTIFICATE OF SERVICE**

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re:

City of Detroit, Michigan,  
Debtor.

Bankruptcy Case No. 13-53846

Honorable Thomas J. Tucker

Chapter 9

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on May 4, 2015, he served a copy of the foregoing  
***CITY OF DETROIT'S OBJECTION TO SHEILA REED'S APPLICATION FOR  
ADMINISTRATIVE EXPENSE CLAIM*** as listed below, via First Class United States Mail:

Ms. Sheila LaDean Reed  
336 Pinecrest  
Ferndale, MI 48220

DATED: May 4, 2015

By: /s/ Marc N. Swanson

Marc N. Swanson  
150 West Jefferson, Suite 2500  
Detroit, Michigan 48226  
Telephone: (313) 496-7591  
Facsimile: (313) 496-8451  
swansonm@millercanfield.com